

FILED 10 AUG 10 15:59 USDC-ORP

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

CR No. 10- 340 - KI

v.

INDICTMENT

18 U.S.C. §§ 1591, 1594

LENDRICK LEE THOMAS,

18 U.S.C. § 2423

Defendant.

UNDER SEAL

THE GRAND JURY CHARGES:

COUNT 1

Sex Trafficking of Minor

18 U.S.C. § 1591

Beginning about February 2010 and continuing to about on or about June, 2010, in the District of Oregon and elsewhere, **LENDRICK LEE THOMAS**, defendant herein, did the following acts, while knowing, and in reckless disregard of the fact, that a female "C.S.", had not attained the age of 18 years and would be caused to engage in a commercial sex act:

- (a) Defendant, **LENDRICK LEE THOMAS**, did, while in or affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, or maintain by any means and attempt to recruit, entice, harbor, transport, provide, obtain, and maintain by any means, a person known as "C.S."; and

- (b) Defendant, **LENDRICK LEE THOMAS**, did benefit, financially or by receiving anything of value, from participation in a venture which engaged in or attempted to engage in the recruiting, enticing, harboring, transporting, providing, obtaining, and maintaining by any means a person known as "C.S."

All in violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2), (b)(1), and 1594(a).

COUNT 2
Transportation of Minors
18 U.S.C. § 2423

Beginning about February 2010 and continuing through about April 2010, in the District of Oregon and elsewhere, **LENDRICK LEE THOMAS**, defendant herein, did knowingly transport "C.S.", a female under the age of 18, in interstate commerce from the District of Oregon to the State of Washington, with the intent that "C.S." engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense. All in violation of Title 18, United States Code, Section 2423(a).

COUNT 3
Transportation of Minors
18 U.S.C. § 2423

Beginning about February 2010 and continuing through about April 2010, in the Western District of Washington and District of Oregon, **LENDRICK LEE THOMAS**, defendant herein, did knowingly transport "C.S.", a female under the age of 18, in interstate commerce from the State of Washington to the District of Oregon, with the intent that "C.S." engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense. All in violation of Title 18, United States Code, Section 2423(a).

COUNT 4
Transportation of Minors
18 U.S.C. § 2423

Beginning about April 2010 and continuing through about May 2010, in the District of Oregon and elsewhere, **LENDRICK LEE THOMAS**, defendant herein, did knowingly transport "C.S.", a female under the age of 18, in interstate commerce from the District of Oregon to the States of California and Nevada, with the intent that "C.S." engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense. All in violation of Title 18, United States Code, Section 2423(a).

COUNT 5
Transportation of Minors
18 U.S.C. § 2423

Beginning about April 2010 and continuing through about May 2010, in the District of Oregon and elsewhere, **LENDRICK LEE THOMAS**, defendant herein, did knowingly transport "C.S.", a female under the age of 18, in interstate commerce from the State of Nevada to the District of Oregon, with the intent that "C.S." engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense. All in violation of Title 18, United States Code, Section 2423(a).

DATED this 10 day of August 2010.

A TRUE BILL.

OFFICIATING FOREPERSON

Presented by:

DWIGHT C. HOLTON
United States Attorney



KEMP L. STRICKLAND, OSB #96118
Assistant United States Attorney